

September 06, 2023

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

JADEN RAMOS,  
ANTHONY AYALA aka ATY  
LEOPOLDO CARVAJAL II,  
ERIC CASTILLO JUAREZ aka EZZ, and  
ADO DUKIC,  
Defendants.

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CRIMINAL NO. 4:23-cr-00411

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

**COUNT ONE**  
(Conspiracy to Commit Sex Trafficking)

From on or about November 1, 2022, through May 22, 2023, in the Southern District of Texas and elsewhere,

JADEN RAMOS,  
ANTHONY AYALA aka ATY,  
ERIC CASTILLO JUAREZ aka EZZ,  
LEOPOLDO CARVAJAL II, and  
ADO DUKIC,

conspired and agreed with each other, and others known and unknown to the Grand Jury, to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means, and benefitted financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means, any persons knowing and in reckless disregard for the fact that means of force, fraud, and coercion would be used to cause these persons to engage in commercial sex acts and that the persons, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and that the persons would be caused to engage in commercial sex acts.

**In violation of Title 18, United States Code, Sections 1594(c), 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c).**

**COUNT TWO**  
**(Sex Trafficking of Minors)**

From on or about November 1, 2022, through May 22, 2023, in the Southern District of Texas and elsewhere,

**JADEN RAMOS,  
ANTHONY AYALA aka ATY,  
ERIC CASTILLO JUAREZ aka EZZ,  
LEOPOLDO CARVAJAL II, and  
ADO DUKIC,**

defendants herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as Minor Victim 2, who had attained the age of 14, but was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 2, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 2 to engage in a commercial sex act, and that (2) Minor Victim 2, whom the defendant had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex.

**In violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(1), (b)(2), (c) and 2.**

**COUNT THREE**  
**(Sex Trafficking of Minors)**

From on or about November 1, 2022, through January 31, 2023, in the Southern District of

Texas and elsewhere,

**JADEN RAMOS,**

defendant herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as Minor Victim 1, who had attained the age of 14, but was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 1, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 1 to engage in a commercial sex act, and that (2) Minor Victim 1, whom the defendant had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex.

**In violation of Title 18, United States Code, Sections 1591(a)(1),(a)(2), (b)(1), (b)(2), (c) and 2.**

**COUNT FOUR**  
**(Sex Trafficking of Minors)**

From on or about March 1, 2022, through May 22, 2023, in the Southern District of Texas and elsewhere,

**JADEN RAMOS,**

defendant herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as Minor Victim 3, who had not attained the age of 14, and benefitted financially and by receiving anything of value from participation in a venture

which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 3, whom the defendant had a reasonable opportunity to observe, had not attained the age of 14 years and would be caused to engage in a commercial sex.

**In violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(1), (c) and 2.**

**COUNT FIVE**  
**(Sex Trafficking by Force, Fraud or Coercion)**

From on or about November 1, 2022, through March 11, 2023, in the Southern District of Texas and elsewhere,

**JADEN RAMOS,**

defendant herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a female known as Adult Victim 1, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Adult Victim 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Adult Victim 1 to engage in a commercial sex act.

**In violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(1) and 2.**

**NOTICE OF FORFEITURE**  
**(18 U.S.C. § 1594(d))**

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendants,

**JADEN RAMOS,**

**ANTHONY AYALA aka ATY,  
ERIC CASTILLO JUAREZ aka EZZ,  
LEOPOLDO CARVAJAL II, and  
ADO DUKIC,**

that in the event of conviction of the offenses charged in Counts One through Five of this Indictment, the following property is subject to forfeiture:

- (1) all real and personal property that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation and all property traceable to such property; and
- (2) all real and personal property constituting or derived from proceeds obtained, directly or indirectly, as a result of such violation and all property traceable to such property.

**Money Judgment and Substitute Assets**

In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture. The United States may seek the imposition of a money judgment.

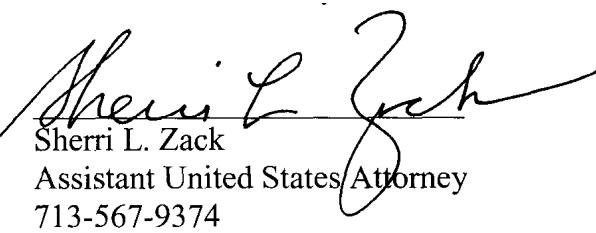
A True Bill:

**Original Signature on File**

Grand Jury Foreperson

ALAMDAR S. HAMDANI  
United States Attorney

By:

  
Sherri L. Zack  
Assistant United States Attorney  
713-567-9374